

MAR 24 2000

Friends of the Clearwater

PO Box 9241

Moscow, ID 83843

Federal Caucus Comment Record, c/o BPA-PL

707 W. Main St. Suite 500

Spokane, WA 99201

March 15, 2000

RE: ALL-H PAPER

Dear BPA:

The following comments on the All-H Paper are submitted on behalf of Friends of the Clearwater. We are in favor of Alternative D: Maximum Protections.

We place returning the wild salmon runs to their historic levels as the highest priority in this debate. We feel all other considerations should be secondary.

For habitat, we support the coordination and prioritization of federal actions. For this matter, we cannot support returning power to the states, for the states have notoriously weaker forest and water protection standards as compared to the national level.

Increased pressure must be put on the U.S. Forest Service to stop building roads and logging in tributaries that affect the spawning ground of salmon, steelhead and bull trout. Currently there are active timber sales which degrade the last strongholds for salmon, steelhead, bull trout, and west slope cutthroat trout. New roads and logging in the Otter-Wing and Mackey Day timber sales on the Nez Perce National Forest are sending literally tons of sediment into critical spawning habitat in Ten-mile Creek and the South Fork of the Clearwater River.

The Clearwater National Forest is planning to log 75 million board feet and over 8,000 acres in the North Lochsa Face sale. Part of the logging is in the Fish Creek drainage, a tributary of the Lochsa River. Fish Creek is one of the last strongholds of steelhead on the Lochsa River. If implemented the North Lochsa Face timber sale would drastically degrade the habitat for these fish. The Forest Service uses junk science to claim the massive logging projects will have no effect on fish habitat or water quality.

Restoration projects including road removal should be prioritized and implemented on federal, state and private land.

For hatcheries, we support increasing conservation programs to conserve genetic resources. "Mitigation" hatcheries that use weak genetic stocks are likely contributing to the decline of wild salmon. While the mitigation hatchery salmon

play a vital role in the forest ecosystems by bringing biomass from the ocean, these benefits must be weighed with their detriment to the wild salmon. We support an effort to replace the mitigation hatcheries with "conservation" hatcheries. Ultimately, the goal must be to recover the salmon and steelhead so that neither type of hatchery is needed.

For hydropower, we support breaching the four lower Snake River dams as well as water augmentation from southern Idaho. According to the great majority of scientists working on this issue, dam breaching is the only option with a high probability of restoring Snake River salmon. Several scientific reviews, including the Independent Scientific Group (ISG), Independent Scientific Advisory Board (ISAB), and Process for Analyzing and Testing Hypothesis (PATH), have criticized the salmon barging program and called for restoring more natural, free-flowing river conditions in order to recover the fish. According to PATH, dam removal is the most likely option for restoring healthy, harvestable salmon runs. In addition, 206 scientists signed a letter to President Clinton, agreeing with PATH's conclusions about restoring a free-flowing river. In 1999, dam breaching was also endorsed as the most viable option for salmon recovery by the Western Division of the American Fisheries Society.

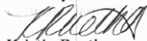
Many smolts die during their estuary life cycle. Part of this mortality is likely due to delayed mortality inflicted during transportation on barges and trucks. In addition, many salmon and steelhead may die because the estuaries are not as nutrient rich. Nutrient rich soil from Columbia Basin used to be deposited in these estuaries. This is no longer the case, because the numerous dams throughout the basin have stopped the movement of this nutrient rich sediment.

Please do not delay on breaching the four lower Snake River dams. Delaying could weaken these wild salmon and steelhead runs beyond recovery.

For harvest, we support no additional restrictions on Native American harvest, but support the reduction of all other harvest impacts on listed populations to "conservation crisis levels" for a period of years.

Once again please do not delay - breach the four lower Snake River dams.

Sincerely,



Kristin Ruether

Friends of the Clearwater